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IN THE UNITED STATES DISTRICT COURT
OF THE NORTHERN MARIANA ISLANDS

LISA BLACK,

) Civil Case No. 05-0038
)

Plaintiff,

)

) Declaration of Elizabeth Nepaial
)

vs.

)

JIM BREWER, CNMI Public School
System and JOHN AND/OR JANE DOE,

)

)

Defendants.

)

DECLARATION OF ELIZABETH NEPAIAL

I, Elizabeth Anne Nepaial, declare under penalty of perjury that the following information is true and accurate:

1. I am more than eighteen years of age.
2. I began working for the Public School System in 1990. I worked for NMC from 1991-1994. I returned to PSS in 1994 where I have been working ever since.
3. During school year 2004-2005, I worked as the Vice-Principal for Curriculum and Instruction for Hopwood Junior High School (HJHS).
4. As the Vice-Principal at HJHS, I was one of Lisa Black's supervisors.
5. In October of 2004, some HJHS staff members prepared and submitted to the Commissioner's Office a document entitled "letter of concern".

- 1 6. The letter contained inaccurate and petty complaints about my performance as Vice-
2 Principal.
- 3 7. Nariami Sikyang, counselor at HJHS, was the spokesperson and leader of the group
4 involved in the letter of concern.
- 5 8. The "letter of concern" and the disclosure of it to the media and the community caused
6 me a great deal of personal stress and significantly affected the working environment at
7 HJHS.
- 8 9. The letter of concern and public exposure damaged my professional reputation and
9 affected my ability to work as an administrator at HJHS.
- 10 10. From October until nearly the end of school year 2004-05, staff members and community
11 members became focused on the dispute. The divisive environment affected HJHS's
12 administration, teachers and staff's ability to focus on an accreditation review, which
13 took place in the spring of 2005.
- 14 11. Lisa Black repeatedly ignored my instructions and the instructions of the administrators
15 at HJHS.
- 16 12. During December of 2004 while Mr. Brewer was on leave, I was the Acting Principal of
17 HJHS.
- 18 13. During that time, I issued bulletins with reminders about substitution coverage and a
19 schedule. The documents listed below are true and accurate copies of the documents
20 provided to Lisa Black and other HJHS teachers. Bulletins are placed in each teacher's
21 box and posted next to the sign in sheet where teachers sign in and out everyday and
22 posted on the office bulletin board. The substitution schedule.
 - 23 a. December 13, 2004 Teacher Bulletin (bates stamped 1908-09).
 - 24 b. December 17, 2004 Teacher Bulletin (bates stamped 1910-11).
 - 25 c. December 22, 2004 Teacher Bulletin (bates stamped 1912-13).
 - 26 d. Approved Substitution Schedule for December 20-22 (12/21 Day B and 12/22
27 Day A - bates stamped 420).
 - 28

e. Approved Substitution Schedule for December 20-22 (12/20 Day B, 12/21 Day A and 12/22 Day B – bates stamped 421).

14. Lisa Black did not report to her assigned coverage for Ms. Hammon's class during 8th period.

15. The teacher schedule was placed in Lisa Black's box at HJHS.


16. On another occasion on April 14, 2005, I asked a student to deliver a note to Lisa Black.

The note requested that Lisa meet with me at the end of school that day. The note dated April 14, 2005 2:40 pm (bates stamped 1904) is an accurate copy of the note provided to Lisa Black on April 14, 2005.

17. Lisa Black did not report to a meeting with me. She signed out of school at 4:00 pm.

18. The letter of concern dated April 18, 2005 (bates stamped 410) with numbers 11 and 13 in bold regarding Lisa Black's failure to report to a meeting with me and her failure to provide information regarding an excused absence is a true and accurate copy of the letter delivered to Lisa Black.

Signed this 7 day of November, 2006 on the island of Saipan in the Commonwealth of the Northern Mariana Islands by:


Elizabeth Anne Nepaial